

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION-DETROIT

IN THE MATTER OF:

MOOSE M. SCHEIB,

Debtor.

Case No. 21-42581
Chapter 7
Hon. Mark A. Randon

KELLY SILVERA JARRETT

Plaintiff,
v.

Adv. Proc. No. 21-04167-Mar
Hon. Mark A. Randon

MOOSE SCHEIB, a/k/a MUSTAPHA SCHIEB

Defendant.

REPORT OF PARTIES' RULE 26(f) CONFERENCE

Pursuant to Fed. R. Bankr. P. 7026 and Fed. R. Civ. P. 26(f), a conference was held
on September 22, 2021, via telephone and was participated in by:

Solomon M. Radner and Paul F. Doherty for
plaintiff Kelly Silvera Jarrett

Jeffrey H. Bigelman for defendant Moose Schieb

This is submitted as the required report of that conference.

(1) Initial Disclosures required by Fed. R. Civ. P. 26(a)(1).

The parties will exchange by October 15, 2021.

(2) **Discovery Plan.** The parties propose the following discovery plan:

- (a) Discovery will be needed on the following subjects:
 - 1. Plaintiff's claims and Defendant's defenses.
- (b) All discovery commenced in time to be completed by:
March 1, 2022
- (c) Maximum of interrogatories by each party to any other party: 30
- (d) Maximum number requests for admission by each party to any other party: 30
- (e) Maximum number of depositions by plaintiff(s) and by defendant(s):
Five each.
- (f) Each deposition limited to maximum of seven hours unless extended by agreement of parties.
- (g) Reports from retained experts under Fed. R. Civ. P. 26(a)(2) due:
from plaintiff by December 15, 2021 from defendant by January 15, 2022.
- (h) Supplementation under Fed. R. Civ. P. 26(e) in a timely manner as required by the court rule.
- (i) Discovery of electronically stored information
 - (i) This adversary proceeding involves the discovery of electronically stored information
 - (ii) Pursuant to E.D. Mich. LBR 7026-4, the Model Order Relating to the Discovery of Electronically Stored Information approved by the District Court will apply.

(3) **Other Agreed Upon Items.**

- (a) Plaintiff is granted leave through, and the deadline is October 15, 2021 to join additional parties and to amend the pleadings.

(b) Defendant is granted leave through, and the deadline is, November 1, 2021, to join additional parties and to amend pleadings.

(c) All potentially dispositive motions must be filed by March 15, 2022

(d) The proceeding will be ready for trial by April 15, 2022 . The trial is expected to take approximately three trial days.

(e) Jury Trial Matters.

(i) [x] a jury trial was not timely demanded and is waived; or

(f) The parties agree that:

[] This is a core proceeding; or

[x] This is a non-core proceeding otherwise related to the bankruptcy case.

(g) [x] The parties consent to the Bankruptcy Court entering a final order or judgment in this proceeding; or

[] The parties do not consent to the Bankruptcy Court entering a final order or judgment in this proceeding.

(4) Other matters. N/A

(5) Matters not agreed upon or insufficiently addressed by the foregoing. N/A

/s/ Solomon M. Radner

Solomon M. Radner (P73653)

Paul F. Doherty (P36579)

Attorney for Plaintiff

/s/ Jeffrey H. Bigelman

Jeffrey H. Bigelman (P61755)

Attorney for Defendant

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CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2021, a true and correct copy of the foregoing Report of Parties' Rule 26(F) Conference, was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all ECF participants.

Respectfully Submitted,

JOHNSON LAW, PLC

By: /s/ Solomon M. Radner

Solomon M. Radner (P73653)

Paul F. Doherty (P36579)

Attorneys for Plaintiff

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Date: September 22, 2021